



March 22, 2019

George Morrissey, DPW
City of Cuba City
108 N Main St
Cuba City WI 53807

Subject: City of Cuba City (WPDES WI-0022217)
Adaptive Management Plan – Conditional Approval

Dear Mr. Morrissey:

The Department received the final draft of the Adaptive Management (AM) Plan prepared by Town & County Engineering on behalf of the City of Cuba City. The final plan dated February 2019, was received via electronic submittal on March 1, 2019. The Department has reviewed the AM plan and has no additional comments at this time.

Based on the WDNR review, the AM Plan is in general conformance with the WDNR Adaptive Management Guidance and requirements contained in s. NR 217.18, Wis. Adm. Code. The plan indicates that the City of Cuba City will utilize AM to comply with the effluent limitations for total phosphorus for their discharge from the Cuba City Wastewater Treatment Facility, Outfall 001, to the Coon Branch of the Galena River. Actions outlined in the AM plan involve nonpoint phosphorus reductions throughout the Coon Branch Watershed, identified as the AM plan's action area. For continued AM eligibility, phosphorus reductions undertaken by the Cuba City WWTF and various AM partners are expected to offset the WWTF's proportional phosphorus loading to the Coon Branch, 280 lbs/yr, within the first permit term.

The WDNR conditionally approves the AM Plan as a basis for phosphorus compliance during the next WPDES permit term. The WDNR has assigned the AM plan a tracking number of WQT-2019-0003 and will be referenced as such in the draft WPDES permit. The draft permit will contain an interim limit for phosphorus and reporting requirements consistent with s. NR 217.18, Wis. Adm. Code. The final AM plan will be included as part of the public notice package for permit reissuance, and final approval is subject to public comment and EPA review.

The department appreciates your interest in watershed-based phosphorus compliance. If you have any questions or comments, please contact me at (262) 574-2135 or email amy.garbe@wisconsin.gov.

Thank you,

Amy Garbe, P.E.
Wastewater Engineer
Wisconsin Department of Natural Resources

e-CC: Roger Helbing – Cuba City
Caitlin Oconnell – WDNR
Sean Spencer – WDNR
Greg Droessler – Town & Country